



ADAM I. KLEINBERG

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November 27, 2013

Via ECF

Honorable Gary R. Brown
U.S. District Court
Eastern District of New York
100 Federal Plaza
Central Islip, New York 11722

Re: G.D.S v. Northport-East Northport U.F.S.D., et al.
Index No. : 12 Civ. 2191 (ADS) (GRB)
File No. : 110102

Dear Magistrate Judge Brown:

We represent all defendants in the above-referenced matter.

We write to seek clarification to Your Honor's Order of November 26, 2013 with respect to the previously scheduled deposition of non-party A.S. Plaintiff's counsel also seeks clarification of the Order and joins in this letter.

Pursuant to the Order, all counsel will appear before Your Honor on December 3, 2013 at 10:30 a.m. to address any concerns by counsel for A.S. as to the deposition of her client. The Court previously scheduled the deposition of A.S. to take place at that date and time. We seek clarification as to whether the deposition is to proceed on December 3rd following the conference or whether the deposition will be rescheduled to another date and time.

At the request of A.S.' counsel, the parties entered into a confidentiality order governing the disclosure of any medical records. We believe that A.S.' counsel will soon be submitting it to the Court to be so-ordered. To the extent that counsel for A.S. intends to produce any medical documentation to the Court at the upcoming conference, we ask that copies of any such documents are provided to all counsel in advance of the conference so that we may have adequate time to prepare for any related discussion.

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Thank you for your consideration of this matter.

Respectfully submitted,

SOKOLOFF STERN LLP

A handwritten signature in black ink, appearing to read 'AK', is written over the firm name.

Adam I. Kleinberg

cc: All counsel of record (via ECF)